

REMARKS

Claims 1-28 are pending in this application.

Applicants appreciate the Examiner's allowance of claims 13-15 and 26-28, and the Examiner's indication that claims 3-7, 12, 18-20, and 25 define allowable subject matter.

Applicants' response to the prior art rejection entered in the Office Action is set forth below.

Applicants respectfully request reconsideration of the rejection of claims 1, 2, 8-11, 16, 17, and 21-24 under 35 U.S.C. § 102(b) as being anticipated by *Kakutani* (U.S. Patent No. US 6,215,561 B1). As will be explained in more detail below, the *Kakutani* reference does not disclose each and every feature specified in independent claims 1, 8, 17, and 21.

The *Kakutani* reference discloses a technique for minimizing the deterioration of picture quality due to quantization errors caused by tone number conversion. In support of the anticipation rejection, the Examiner relies upon Figure 9, which is a block diagram illustrating the functionality of the disclosed image processing apparatus. In accordance with Figure 9, however, image processing is carried out in a color space in which the number of tones is reduced, i.e., a color space with a relatively small number of colors. As such, the configuration disclosed by *Kakutani* is essentially the opposite of that defined in the claimed subject matter.

More specifically, *Kakutani's* configuration is intended to reduce the number of tones to be converted so as to 1) reduce the memory capacity required for a color correction table, and 2) simplify the technique for color correction (see, for example, Figure 9, column 23, line 12 to column 24, line 25, and column 24, line 43 to column 26, line 15 of the *Kakutani* reference). In contrast, the claimed subject matter *increases* the number of tones for carrying out image processing (note that each of independent claims 1, 8, 17, and 21 includes language that specifies that the color number or color value of the image data is increased in the

conversion process). Thus, for at least the foregoing reasons, the *Kakutani* reference does not disclose each and every feature of independent claims 1, 8, 17, and 21.

Accordingly, independent claims 1, 8, 17, and 21 are patentable under 35 U.S.C. § 102(b) over *Kakutani*. Claim 2, which depends from claim 1, claims 9-11, each of which ultimately depends from claim 8, claim 16, which ultimately depends from one of claims 1 and 8, and claims 22-24, each of which ultimately depends from claim 21, are likewise patentable under 35 U.S.C. § 102(b) over *Kakutani* for at least the same reasons set forth above regarding the applicable independent claim.

In view of the foregoing, Applicants respectfully request reconsideration and reexamination of claims 1-12 and 16-25, as presented herein, and submit that these claims are in condition for allowance, along with allowed claims 13-15 and 26-28. Accordingly, a notice of allowance is respectfully requested. In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at (408) 749-6902. If any additional fees are due in connection with the filing of this paper, then the Commissioner is authorized to charge such fees to Deposit Account No. 50-0805 (Order No. MIPFP010).

Respectfully submitted,
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